

Maggie McCready  
Vice President  
Federal Regulatory



1300 I Street, NW, Suite 400 West  
Washington, DC 20005

Phone 202 515-2543  
maggie.m.mccready@verizon.com

April 3, 2012

**Ex Parte**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

**RE: Universal Service Contribution Methodology, WC Docket No. 06-122**

Dear Ms. Dortch:

USTelecom's March 28, 2012 letter in this docket discussed a number of sensible, near-term reforms to the universal service contribution mechanism.<sup>1</sup> These suggestions would improve the USF contribution system, and the Commission should incorporate them into its reform efforts as appropriate. Among other things, the USTelecom letter addresses contribution certifications that resellers provide today to underlying carriers. USTelecom Letter at 7. The reseller certification process and related proceedings has long been a source of frustration, and the Commission should use this opportunity to improve the process and provide clarity for all providers.

In 2010, for example, Verizon and other carriers sought clarification on a Wireline Competition Bureau order addressing reseller certifications provided by TelePacific to its wholesale carriers.<sup>2</sup> Joint Petitioners sought clarification that the Bureau's *TelePacific Order* did not provide that wholesale carriers could be required to restate their own revenues and increase contributions when a reseller submits a contribution certification in error.<sup>3</sup> In commenting on the

---

<sup>1</sup> Letter from David Cohen, USTelecom, to Marlene Dortch, FCC, WC Docket No. 06-122 (March 28, 2012) ("USTelecom Letter").

<sup>2</sup> Petition of AT&T, Inc., CenturyLink, SureWest Communications, and Verizon for Clarification or in the Alternative for Partial Reconsideration, *Request for Review of a Decision of the Universal Service Administrator and Emergency Petition for Stay by U.S. TelePacific d/b/a TelePacific Communications*, WC Docket No. 06-122 (June 1, 2010) ("Joint Petition").

<sup>3</sup> *Request for Review of a Decision of the Universal Service Administrator and Emergency Petition for Stay by U.S. TelePacific d/b/a TelePacific Communications*, Order, 25 FCC Rcd 4652 (2010) ("*TelePacific Order*") (addressing a Universal Service Administrative

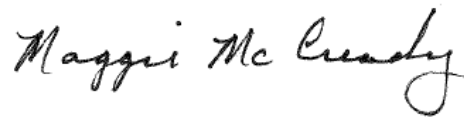
Marlene H. Dortch

April 3, 2012

Page 2

Joint Petition, some parties also suggested that there could be an expectation that resellers will “apportion” their certifications to wholesale providers between services resold as telecommunications and services resold as information services – and/or similarly to apportion traffic over mixed-use (voice and data) circuits.<sup>4</sup> As part of overall contribution reform, the Commission should act on the Joint Petition and confirm that wholesale carriers are indeed not required to “make up” contributions of resellers in situations where certifications are submitted in error. If the Commission desires to consider a requirement that resellers apportion their certifications to wholesalers it should also seek comment on whether such a process would be workable in practice, and the potential mechanics of such a procedure.

Sincerely,

A handwritten signature in cursive script that reads "Maggi McCreedy".

cc: Carol Matthey  
Trent Harkrader  
Vickie Robinson

---

Company (USAC) decision) (Verizon has never taken a position on the underlying facts of TelePacific’s appeal).

<sup>4</sup> See Opposition of U.S. TelePacific Corp. d/b/a TelePacific Communications at 10 (July 6, 2010); Comments of the Coalition for Fairness and Restraint in USAC Fund Administration at 7 (July 6, 2010); Reply Comments of The Ad Hoc Coalition of International Telecommunications Companies at 6 (July 19, 2010).